

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

DEFENDANT GOOGLE LLC’S RENEWED MOTION TO COMPEL

Defendant Google LLC (“Google”) hereby moves to compel Plaintiff Singular Computing LLC (“Singular”) to produce documents responsive to Google’s Request for Production No. 68, including the outputs cited in its First Amended Complaint, as it previously represented to Google and the Court that it would. Google submits the accompanying Memorandum of Law in Support of its Renewed Motion to Compel.

As set forth in Google’s Memorandum of Law, the discovery Google seeks from Singular is relevant to material facts at issue in the litigation. Furthermore, Singular has represented to this Court that it would produce the outputs cited in the First Amended Complaint. For these reasons, as set forth more fully in the accompanying Memorandum of Law, Google respectfully requests that this Honorable Court: Order Singular to produce all documents responsive to Google’s Request for Production No. 68 including, but not limited to, the output of the program relied upon in the First Amended Complaint, including any files excerpted in the First Amended Complaint.

Respectfully submitted,

Dated: April 26, 2021

By: /s/ Matthias Kamber
Gregory F. Corbett (BBO #646394)
gregory.corbett@wolfgreenfield.com
Nathan R. Speed (BBO # 670249)
nathan.speed@wolfgreenfield.com
Elizabeth A. DiMarco (BBO #681921)
elizabeth.dimarco@wolfgreenfield.com
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Telephone: (617) 646-8000
Fax: (617) 646-8646

Asim Bhansali (*pro hac vice*)
abhansali@kblfirm.com
KWUN BHANSALI LAZARUS LLP
555 Montgomery Street, Suite 750
San Francisco, CA 94111

Matthias Kamber (*pro hac vice*)
mkamber@keker.com
KEKER, VAN NEST & PETERS LLP
633 Battery Street
San Francisco, CA 94111-1809

Attorneys for Defendant Google LLC

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed _____

Nathan R. Speed